

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CYCLE-CRAFT CO., INC.

d/b/a BOSTON HARLEY-DAVIDSON/BUELL,

Plaintiff,

v.

HARLEY-DAVIDSON MOTOR COMPANY, INC.

and BUELL DISTRIBUTION COMPANY, LLC,

Defendants.

CIVIL ACTION

NO. 04 11402 NMG

**DEFENDANTS' OBJECTIONS TO CYCLE-CRAFT'S COUNTER
DEPOSITION DESIGNATIONS**

Defendants, Harley-Davidson Motor Company, Inc. and Buell Distribution Company, LLC (collectively, "Harley-Davidson"), hereby file their objections to the counter deposition designations that plaintiff, Cycle-Craft Co., Inc. ("Cycle-Craft") expects to present at trial. Harley-Davidson reserves its right to supplement or amend these objections or to make counter designations.

1. Debra Lunsford

Page	Lines	Objection
47	25	Relevancy
48	1-2, 19-21	Relevancy
56	16-25	Incomplete Testimony (will withdraw objection if Page 57, Line 8 to Page 62, Line 9 are added to the designation)
57	1-7	Incomplete Testimony (will withdraw objection if Page 57, Line 8 to Page 62, Line 9 are added to the designation)

Page	Lines	Objection
124	3-25	Incomplete Testimony (will withdraw objection if Page 125, Lines 22-25 and Page 126, Lines 1-8 are added to designation)
125	1-21	Incomplete Testimony (will withdraw objection if Page 125, Lines 22-25 and Page 126, Lines 1-8 are added to designation)
133	13-21	Incomplete Testimony (will withdraw objection if Page 125, Lines 22-25 and Page 126, Lines 1-8 are added to designation)
147	4-22	Relevancy
149	9-13	Relevancy
151	23-25	Relevancy
152	1-2	Relevancy
180	15-18	Relevancy

2. Michael Stevens

Page	Lines	Objection
59	17-21	Relevancy and Hearsay
60	12-25	Relevancy and Hearsay
61-65	Entire Pages	Relevancy and Hearsay
66	1-6	Relevancy and Hearsay

3. Barry Nichols

Page	Lines	Objection
69	3-17 ¹	Relevancy

¹ Cycle-Craft added this designation to its May 12, 2006 Pre-Trial Memorandum.

Respectfully submitted by,

**Harley-Davidson Motor Co., Inc.,
and Buell Distribution Co., LLC**

By their attorneys,

/s/ William F. Benson

William N. Berkowitz, BBO# 544148

William F. Benson, BBO# 646808

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Dated: May 15, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney(s) of record for each other party by electronic mail on May 15, 2006.

/s/ William F. Benson

William F. Benson